

United States District Court
For THE Northern District of Alabama

FILED

2019 JUL 19 A 10:30
U.S. DISTRICT COURT 30
N.D. OF ALABAMA
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Demarcus V. Coleman
Plaintiff

v

Zackery McClemore, Et. AL.
Defendants

Case No. 2:19-CV-899-LSC-SGC

Plaintiff First Set of Interrogatories to Defendants

In accordance with rule 33 of the Federal Rules of Civil Procedure, Plaintiff Requests that defendants Zackery McClemore, C.O Gadsen, C.O Binder, and C.O SPEAKS answer the following Interrogatories under oath, and that the answers be signed by the person making them and be served on Plaintiff Within 30 days of service of these Interrogatories

If You cannot answer the following Interrogatories In Full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying Your inability to answer the remainder and stating whatever information or knowledge You have concerning the unanswered portions

The Interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes

Questions for each Defendant listed on following pages

Questions for C.O. McLemore

- 1.) Did C.O. Binder open Inmate Coleman Door Prior to the day of Incident?
- 2.) Did You spray Inmate Coleman as soon as door opened?
- 3.) Arent Inmates in lock-up suppose to be Handcuffed before there door is open?
- 4.) Was Inmate Coleman Handcuffed?
- 5.) Did Inmate Coleman Pose as a threat to You? And how?
- 6.) Was the code hit?
- 7.) Wat other officers assisted You with beating Inmate Coleman?
- 8.) Did Inmate Coleman receive Proper Medical treatment?
- 9.) Was mental health Advised of Incident?
- 10.) When Inmate Coleman return from infirmary, Was Inmate Struck a second time?
- 11.) Who was present when You escorted Coleman back to his cell?
- 12.) Did You uncuff Inmate Coleman when You escorted him back to cell inside room?
- 13.) Did You Assault Inmate Coleman multiple times while Coleman balled up?
Inside cell?
- 14.) Did You C.O. McLemore get body chart?
- 15.) To Your Acknowledge, Did you violate Your 8th Amendment in any form?
- 16.) Why wasn't code call second time?
- 17.) During Incident, did You officer McLemore use excessive force?
- 18.) Was two other Inmates Assaulted before Inmate Coleman Incident?
- 19.) Was Coleman Advised by officers that he was next?
- 20.) After Incident, Was Coleman's door still being rolled without him being
handcuffed for feeding?
- 21.) Who Struck Inmate Coleman with Baton?
- 22.) Did Coleman fight back? Wat did he do?
- 23.) Do You wish You could change anything about APR 11-15-2019?

Questions for C.O Binder

- 1.) Did You Roll Inmate Coleman Door; April-15-2019, the Day of Incident?
- 2.) Did officer Mclemore spray Inmate Coleman as soon as door rolled?
- 3.) Did Incident occur inside or outside cell?
- 4.) Why did you call the code?
- 5.) Why wasn't inmate mace through tray door?
- 6.) Who all was involved in Incident?
- 7.) Did Inmate get a proper body chart?
- 8.) What cause the Incident to happen?
- 9.) Why didn't you call the code and wait to see what the Sgt or Lt wanted to do?
- 10.) Aren't inmates inside lock-up supposed to be handcuffed before door is rolled?
- 11.) Why was inmate coleman door rolled?
- 12.) What officers ran into inmate coleman cell and assaulted him?
- 13.) Did Inmate coleman constantly ask you to seek medical treatment?
- 14.) Did Inmate coleman Assault C.O Mclemore? And How?
- 15.) Was excessive force used during Assault?
- 16.) Prior to Incident, was Inmate 8th Amendment Violated?
- 17.) Who struck Inmate coleman w/ Baton?
- 18.) Did coleman fight back? What did he do?
- 19.) Do You wish you could change anything about April-15-2019 Incident?

Questions For C.O. Speaks.....

- 1.) You + What officers walked Coleman back to his cell?
- 2.) Was Coleman uncuffed from inside cell?
- 3.) What did you do while present?
- 4.) Who told you + officer McEmore to stop hitting Coleman?
- 5.) Did you assault inmate Coleman at all?
- 6.) Did Inmate get a body chart after second assault?
- 7.) Was Inmate Coleman door rolled after incident, while he was uncuffed on numerous days?
- 8.) Was Inmate Coleman 8th + 14th Amendments Violated?
- 9.) Do you wish you could change anything about APR 1-15-2019?

Questions For C.O. Gadsen

- 1.) What officers were present during Inmate Coleman Assault 4-15-2019?
- 2.) What cause the incident to happen?
- 3.) Who all jumped & assaulted Inmate Coleman?
- 4.) Why wasn't Inmate in Handcuff?
- 5.) Why wasn't the code called?
- 6.) Was a proper body chart done?
- 7.) Did you receive a body chart?
- 8.) Did you advise Inmate Coleman that he was next?
- 9.) Was excessive force used prior to incident?
- 10.) Did Inmate Coleman ball us as Yall entered Room?
- 11.) After incident, was Yall still rolling Inmate Coleman door without him being cuffed or supervisor present?
- 12.) Prior to incident, was Inmate Coleman 8th & 14th Amendment Violated?
- 13.) Did Coleman inform you that he was hurting?
- 14.) Did Coleman fight back? What did he do?
- 15.) Do you think you could have handle situation different? How?
- 16.) IF you could, what would you change about April-15-2019 Incident?

• Date: 7/16/2019

• Signature: Demand C

100 Warrior Lane Bess, AL 35023